



# **Air Quality Permitting Statement of Basis**

**December 20, 2005**

**Tier II Operating Permit and Permit to Construct  
No. T2-050423**

**McCain Foods, Inc., Burley, ID**

**Facility ID No. 031-00014**

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**FINAL**

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## **Acronyms, Units, and Chemical Nomenclature**

<b>AFS</b>	<b>AIRS Facility Subsystem</b>
<b>AIRS</b>	<b>Aerometric Information Retrieval System</b>
<b>AQCR</b>	<b>Air Quality Control Region</b>
<b>CO</b>	<b>carbon monoxide</b>
<b>DEQ</b>	<b>Department of Environmental Quality</b>
<b>HAPs</b>	<b>Hazardous Air Pollutants</b>
<b>IDAPA</b>	<b>A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</b>
<b>km</b>	<b>kilometer</b>
<b>MACT</b>	<b>Maximum Available Control Technology</b>
<b>NESHAP</b>	<b>Nation Emission Standards for Hazardous Air Pollutants</b>
<b>NO<sub>x</sub></b>	<b>nitrogen oxides</b>
<b>NSPS</b>	<b>New Source Performance Standards</b>
<b>PM<sub>10</sub></b>	<b>Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</b>
<b>PSD</b>	<b>Prevention of Significant Deterioration</b>
<b>Rules</b>	<b>Rules for the Control of Air Pollution in Idaho</b>
<b>SIC</b>	<b>Standard Industrial Classification</b>
<b>SIP</b>	<b>State Implementation Plan</b>
<b>SM</b>	<b>synthetic minor</b>
<b>SO<sub>2</sub></b>	<b>sulfur dioxide</b>
<b>T/yr</b>	<b>Tons per year</b>
<b>UTM</b>	<b>Universal Transverse Mercator</b>
<b>VOC</b>	<b>volatile organic compound</b>

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 through 410 and 200 through 228, *Rules for the Control of Air Pollution in Idaho*, for issuing Tier II operating permits and permits to construct.

## **2. FACILITY DESCRIPTION**

McCain Foods Inc. (McCain Foods) is a frozen food processor of potato products. McCain Foods currently operates two process lines for Prime Products, one in each plant.

## **3. FACILITY / AREA CLASSIFICATION**

McCain Foods is classified as a synthetic minor facility because McCain Foods' potential to emit is limited to less than major source thresholds. The AIRS classification is "SM." The SIC defining the facility is 2037.

The facility is located within AQCR 64 and UTM zone 12. The facility is located in Cassia County which is designated as unclassifiable for all regulated criteria pollutants (PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone). There are no class I areas within 10 km of the facility.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at McCain Foods. This required information is entered into the EPA AIRS database.

## **4. APPLICATION SCOPE**

McCain Foods, Inc. proposes to replace the natural gas fired Prime 1 Dryer (stacks D105 and D106) with a new steam heated dryer (stacks D109, D110, and D111). No change in product throughput will occur with the proposed equipment replacement. Emissions from the replacement dryer will be less than the existing permitted dryer since natural gas will no longer be combusted at the dryer. The steam for the dryer will be provided by the existing boilers at already permitted rates. The application is for the equipment replacement.

### **4.1 Application Chronology**

September 30, 2005	DEQ received the application
October 30, 2005	DEQ declare the application complete

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the regulatory requirements for this permit.

### **5.1 Equipment Listing**

The equipment listing is the same as it was permitted except for Prime 1 Dryer.

Prime 1 Dryer is manufactured by Wolverine Proctor & Schwartz, LLC. Prime 1 Dryer is steam heated with total steam consumption of 16,033 pounds per hour.

## **5.2 Emissions Inventory**

Emissions from the replacement steam heated dryer will be less than the existing permitted dryer since natural gas will no longer be combusted at the dryer. There are no other changes to the permitted emissions limits.

## **5.3 Modeling**

The facility conducted ambient impact analysis for the change of stack location and numbers of Prime 1 dryer. The facility has demonstrated compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard.

## **5.4 Regulatory Review**

This section describes the regulatory analysis of the applicable air quality rules with respect to this permit action.

IDAPA 58.01.01.209.04..... Revisions of Permits to Construct

This rule establishes the procedures for revisions to permits to construct. Emissions are not increasing as a result of this revision; therefore, an opportunity for public comment is not required.

IDAPA 58.01.01.404.04..... Permit Revision or Renewal

This rule establishes the procedures for revisions to Tier II operating permits. Emissions are not increasing as a result of this revision; therefore, an opportunity for public comment is not required.

## **5.5 Fee Review**

A Tier II operating permit processing fee of \$500 applies to this permit revision in accordance with IDAPA 58.01.01.407.01.

## **5.6 Regional Review of Draft Permit**

The draft permit was made available for Twin Falls Regional Office review on November 25, 2005. The comments were received on November 28, 2005. They were addressed in this final permit.

## **5.7 Facility Review of Draft Permit**

The facility didn't request draft permit review.

## **6. PERMIT CONDITIONS**

6.1 Permit Conditions 1.1 and 1.2, Purpose, are re-written for this permit action.

6.2 Information on Prime 1 Dryer in Table 1.1 is revised to reflect the dryer replacement.

6.3 Permit conditions 4.1, 4.2, 4.3, 4.5, 4.6, 4.7, 4.9 are revised to reflect the replacement of Prime 1 Dryer.

6.4 A typo in Permit Condition 7.4 is corrected.

6.5 Emission rates in Tables 8.1 and 9.1 are revised to reflect the replacement of Prime 1 Dryer.

6.6 Permit Conditions 4.8 and 5.6 are re-written for clarification purpose.

## **7. PUBLIC COMMENT**

In accordance with IDAPA 58.01.01.404, a public comment period on the proposed Tier II operating permit and permit to construct does not apply because this permit revision does not result in an increase in emissions.

## **8. RECOMMENDATION**

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue final Tier II Operating Permit and Permit to Construct No. T2-050423 for this permit revision. No entity requested a public comment period and the project does not involve PSD permitting requirements.

SYC/sd Permit No. P-050423

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## **Appendix A**

### ***AIRS Information***

**T2-050423**

# AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Facility Name:** McCain Foods, Inc. (T2-050423)  
**Facility Location:** Burley, ID  
**AIRS Number:** 031-00014

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B						B	U
NO <sub>x</sub>	SM						SM	U
CO	SM						SM	U
PM <sub>10</sub>	SM					SM80	SM	U
PT (Particulate)	SM						SM	U
VOC	B						B	U
THAP (Total HAPs)	B						B	U
			APPLICABLE SUBPART					

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).